

BROOKHAVEN NATIONAL LABORATORY

SBMS Interim Procedure

Interim Procedure Number: 2004-18001-003 Revision: 3

Title: Legal and Other Requirements

Point of Contact: Pat Williams

Management System: Worker Health and Safety

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Approved by (line management, Management System Steward): Jim Tarpinian

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Applicability: Plant Engineering Division, Central Shops Division, Collider-Accelerator Department and ESHQ Directorate

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1. Purpose

- 1.1. This procedure is designed to ensure that BNL has identified relevant information on current health and safety statutes and regulations, as well as other requirements that it has established or adopted, and that BNL has continuing access to such information.

NOTE:

Requirements that apply to the activities conducted at BNL have several sources, including contract obligations, regulatory requirements, and formal commitments made by Laboratory management. BNL has established the [Requirements Management](#) Subject Area to identify and have access to legal and other requirements, including occupational safety and health requirements. The Requirements Management Subject Area describes receipt, initial processing, analysis of external requirement documents, and associated documentation. The Requirements Management Subject Area also ensures change control for processing new or revised external requirements and incorporates these changes into the affected documents.

2. Definitions

- 2.1. Refer to the Definitions contained in OHSAS 18001 Clause 3.

3. Responsibilities

- 3.1. Each Management System Steward is responsible for analyzing new or revised requirement documents to determine their applicability to the Laboratory and for documenting the mechanisms that support compliance with the requirement.
- 3.2. Subject Matter Experts in the occupational health and safety support organizations are responsible for attending professional conferences and training programs, and reviewing on-line bulletin board services that post proposed changes to regulations.
- 3.3. Subject Matter Experts are responsible for maintaining direct communications with the line organizations regarding proposed new or changed OSH requirements.
- 3.4. The SBMS Office is responsible for notifying all staff when new Subject Areas are issued.
- 3.5. When requested by line management, BNL personnel are responsible to participate on teams to develop or revise Subject Areas.

4. Scope

- 4.1. The following specific ESH Standards and occupational health and safety Subject Areas provide Laboratory requirements on key OSH regulations.

ESH Standards

- [1.1.1 Price-Anderson Amendments Act Compliance Validation and Noncompliance Reporting Program](#)
- [1.2.0 Departmental Environment, Safety & Health Inspection](#)
- [1.2.1. Corrective Action Management and Tracking for Internal and External Assessments](#)
- [1.3.1 Construction Safety](#)
- [1.3.0 Review of Facility Design](#)
- [1.3.2 Operational Readiness Review](#)
- [1.4.0 Compressed Gas Cylinder Safety](#)
- [1.4.1 Pressurized Systems for Experimental Use](#)
- [1.4.2 Glass and Plastic Window Design for Pressure Vessels](#)
- [1.5.0 Electrical Safety](#)
- [1.5.1 Lockout/Tagout Requirements](#)
- [1.5.2 Design Criteria for Electrical Equipment](#)
- [1.5.3 Interlock Safety for Protection of Personnel](#)
- [1.9.0 Traffic Safety](#)
- [1.11.0 Aviation Safety](#)
- [1.12.0 Marine Safety](#)
- [1.12.1 Diving](#)

[1.14.0 Identification of Piping Systems](#)
[1.18.0 Excavation Safety](#)
[2.1.3 Pesticides](#)
[2.2.1 Laboratory Workplace Standard for Non-Radioactive Toxic Substances](#)
[2.3.2 RF and Microwaves](#)
[2.6.0 Sanitation](#)
[3.1.2 Radiological Standards](#) (SBMS Program Description)
[3.1.3 Conduct of Radiological Work](#) (SBMS Program Description)
[3.1.5 Radiological Health Support Operations](#) (SBMS Program Description)
[3.1.6 Training and Certification](#) (SBMS Program Description)
[3.1.7 Radiological Records](#) (SBMS Program Description)
[3.1.9 Glossary](#) (SBMS Program Description)
[3.7.0 Procedures for Procurement, Transfer, and Shipment of Radioactive Materials](#) (SBMS Program Description and Subject Area)
[4.0.0 Fire Safety Program](#)
[4.1.2 Means-of-Egress \(Exits\)](#)
[4.3.0 Cutting and Welding](#)
[4.4.0 Local Fire Protection Signaling Systems](#)
[4.10.2 Flammable Liquids: Storage, Use, & Disposal](#)
[4.11.0 Installation of Flammable Gas Systems \(Experimental and Temporary Installations\)](#)
[4.12.0 Special Precautions for Locations Containing Flammable Atmospheres](#)
[4.12.1 Refrigerators for Flammable Liquid Storage](#)
[5.1.0 Nonflammable Cryogenic Liquids](#)
[5.2.0 Flammable Cryogenic Liquids](#)

Subject Areas

[Beryllium](#)
[Biosafety in Research](#)
[Bloodborne Pathogens](#)
[Chemicals, Working with](#)
[Confined Spaces](#)
[Emergency Preparedness](#)
[Hazard Analysis](#)
[Investigation of Incidents, Accidents and Injuries](#)
[Laser Safety](#)
[Lifting Safety](#)
[Lead](#)
[Lifting Safety](#)
[Natural Hazards in the Environment](#)
[Noise and Hearing Conservation](#)
[Occurrence Reporting and Processing System \(ORPS\)](#)
[Oxygen Deficiency Hazards \(ODH\), System Classification and Controls](#)
[Personal Protective Equipment](#)
[Respiratory Protection](#)
[Static Magnetic Fields](#)
[Work Planning and Control for Experiments and Operations](#)

5. Procedure

- 5.1. The Management System Steward shall ensure that BNL has timely information to anticipate changes in regulations, provide feedback to regulating agencies, and plan adequately for achieving compliance.
- 5.2. Once applicability of a new or revised requirement has been determined, the Management System Steward shall determine how the Laboratory currently complies or the actions required for achieving compliance.
- 5.3. The Management System Steward shall develop or revise appropriate Laboratory level documents, develop training, require task and/or group specific procedures, or other methods as appropriate.

NOTE:

The method for translating external requirements into Laboratory subject areas is described in the [Laboratory-Wide Procedures and Guidelines](#) Subject Area.

- 5.4. When conformance with an external requirement or its intent is not possible, either through direct compliance or an equivalent means of complying, the Management System Steward shall not allow activities to proceed until a variance from the requirement is approved.

NOTE:

The subject area [Requesting SBMS Variances](#) describes this process for obtaining a variance to the Laboratory requirements.

- 5.5. Subject Matter Experts shall notify Management System Stewards about proposed changes to regulations.
- 5.6. The Management System Steward shall communicate requirements to line organizations.
- 5.7. The Management System Steward shall ensure all approvals of Laboratory-wide requirements are formally transmitted to the Associate Laboratory Directors via the SBMS Steering Committee.
- 5.8. The SBMS Office shall issue a notification to line personnel of revisions to Laboratory documents.